

EXHIBIT 2

Plaintiffs Alberto Patiño, Maria Del Rosario Martinez, Maria Mari, Rodolfo Tenreiro and Patricia Gonzales (“Plaintiffs”) submit these initial disclosures to Defendants in accordance with FED. R. CIV. P. 26(a).

Preliminary Statement

These initial disclosures are based on information reasonably available to the Plaintiffs at this time. The Plaintiffs reserve the right to identify additional persons, documents, tangible things, and other information for this case, by supplementation of these disclosures, through the formal discovery process, or in any other way. The Plaintiffs also reserve the right to make use of any party’s witnesses or documents in this case. These disclosures are not intended, and should not be construed, as a waiver of any objection to the production, use, or admission into evidence of any document or information that Plaintiffs may be legally entitled to assert during the discovery phase or trial in this matter. Plaintiffs also make the disclosures herein subject to the following objections:

a) **Privileged materials:** Plaintiffs specifically reserve and assert their objections to the production of documents and tangible things which are protected from disclosure by the following privileges: investigation/trial preparation materials – Rule 26(b)(3) of the Federal Rules of Civil Procedure; work product materials – Rule 26(b)(3) and (4) of the Federal Rules of Civil Procedure; consulting expert materials -- Rule 26(b)(4)(B) of the Federal Rules of Civil Procedure; attorney/client communications; and any other applicable privileges.

Items Required by Rule 26(a)

- i. **The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

- A. Alberto Patiño
Patricia Gonzales
Maria Del Rosario Martinez
Maria Mari
Rodolfo R. Tenreiro
c/o Ernest I. Herrera
MALDEF
110 Broadway, Ste. 300
San Antonio, Texas 78205
Telephone: (210) 224-5476

The persons listed above are aggrieved registered voters in Pasadena, Texas, who likely have knowledge of facts related to the challenged ordinances and redistricting, and the constitutional injuries of the plaintiffs as a result of the ordinances.

- B. Pat Van Houte
c/o C. Robert Heath
bheath@bickerstaff.com
Bickerstaff Heath Delgado Acosta LLP
3711 S. MoPac Expressway
Building One, Suite 300
Austin, Texas 78746
Telephone: (512) 472-8021

Cody Ray Wheeler
Don Harrison
Ornaldo Ybarra
c/o Chad Dunn
Brazil & Dunn LLP
4201 Cypress Creek Pkwy, #530
Houston, TX 77068
Telephone: (281) 580-6310

The persons listed above are members of the Pasadena City Council and likely have knowledge of facts surrounding the drafting of charter amendments related to redistricting and redistricting plans.

- C. Johnny Isbell
Bruce Leamon
Phil Cayten
Steve Cote
Darrell Morrison
c/o C. Robert Heath
bheath@bickerstaff.com
Bickerstaff Heath Delgado Acosta LLP

3711 S. MoPac Expressway
Building One, Suite 300
Austin, Texas 78746
Telephone: (512) 472-8021

The persons listed above are members of the Pasadena City Council and likely have knowledge of facts surrounding the drafting of charter amendments related to redistricting and redistricting plans.

D. Linda Rorick
City Secretary
City of Pasadena
c/o C. Robert Heath
bheath@bickerstaff.com
Bickerstaff Heath Delgado Acosta LLP
3711 S. MoPac Expressway
Building One, Suite 300
Austin, Texas 78746
Telephone: (512) 472-8021

Ms. Rorick, City Secretary, likely has knowledge of facts surrounding the formation of the Bond Review/Charter Amendment Committee, administration of municipal elections in Pasadena, draft redistricting plans and the keeping of City records.

E. Roy Mease
4008 Vista Rd.
Pasadena, TX 77504

Cary Bass
202 Pasadena Blvd.
Pasadena, TX 77506
Telephone: (713) 473-5543

Royce Measures
2306 Perez Rd.
Pasadena TX, 77502

J.E. Bear Herbert
2804 Dedman
Pasadena, TX 77503

Bill Welch
Jeff Wagner
Steve Phelps
Larry Peacock

Rosemary Mathews
Victor Villarreal
Addresses Unknown

The persons listed above served as members of the Bond Review / Charter Amendment Committee in 2013 and likely possess knowledge of facts surrounding the work of the committee and proposed amendments to the charter and redistricting proposals.

- F. Gilbert Peña
2912 Blueberry Ln.
Pasadena, TX 77502
Telephone: (281) 685-1501

Mr. Peña likely possesses knowledge of facts concerning participation in Pasadena municipal elections as a candidate.

- G. Kristina Nichols
Stan Stanart
Office of Stan Stanart, Harris County Clerk
1001 Preston, 4th Floor
Houston, TX 77002
Telephone: (713) 274-9550

The above persons possess knowledge of facts concerning Pasadena municipal election data and conducting certain elections for the City.

- H. Sherry McCall
GIS and Database Specialist
Bickerstaff Heath Delgado Acosta LLP
3711 S. Mopac Expressway
Building One, Suite 300
Austin, Texas 78746
Telephone: (972) 899-1783

Sherry McCall likely possesses knowledge of facts concerning the drafting of Pasadena redistricting plans.

- I. Any person, including but not limited to experts, revealed and/or yet to be revealed in discovery.
- J. Any person identified and/or yet to be identified by Plaintiff and Defendants.
- K. Any person necessary to authenticate documents.

ii. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

A. Responsive documents in the possession, custody, or control of Defendants and/or their counsel include:

1. Council meeting minutes, agendas and other meeting documents.
2. Memoranda and communications between City Council members.
3. Maps disclosed by the City Council and on the City website.
4. Video footage stored on DVD of Pasadena City Council Meetings (dates listed below), which the City produced in response to Open Records Requests:

- a. Council Meeting, Aug. 13, 2013
- b. Council Meeting, Aug. 20, 2013
- c. Council Meeting, Aug. 22, 2013
- d. Council Meeting and Council Workshop, March 4, 2014
- e. Council Meeting, March 18, 2014
- f. Council Meeting, April 1, 2014
- g. Council Meeting, April 15, 2014

5. Various file types, which counsel for the City of Pasadena previously produced to counsel for Plaintiffs, containing mapping and demographic data.

B. Harris County election data for Pasadena municipal elections for which the Harris County Clerk provided voting machines and canvassed results, attached.

iii. Computation of damages.

Plaintiffs do not seek damages but do seek reasonable and necessary attorneys' fees to be determined at the conclusion of the litigation.

iv. Insurance agreement.

None.

Dated: March 19, 2015

Respectfully submitted,

/s/ Nina Perales
Nina Perales
Attorney-in-charge

Texas Bar No. 24005046
SDTX Bar No. 21127
Ernest Herrera
(*pro hac vice*)
MEXICAN AMERICAN LEGAL DEFENSE AND
EDUCATIONAL FUND
110 Broadway, Suite 300
San Antonio, TX 78205
Tel: (210)224-5476
Fax: (210)224-5382

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has sent this document by electronic mail and certified mail to all counsel listed below on the 19th day of March, 2015:

C. ROBERT HEATH
bheath@bickerstaff.com
GUNNAR P. SEAQUIST
gseaquist@bickerstaff.com
BICKERSTAFF HEATH
DELGADO ACOSTA LLP
3711 S. MoPac Expressway
Building One, Suite 300
Austin, Texas 78746
Telephone: (512) 472-8021
Facsimile: (512) 320-5638

GENE LOCKE
genelocke@andrewskurth.com
KATHRYN K. ALRICH
katiealrich@andrewskurth.com
ANDREWS KURTH LLP
600 Travis, Suite 4200
Houston, Texas 77002
Telephone: (713) 220-3956
Facsimile: (713) 238-7294

Chad Dunn
Brazil & Dunn LLP
4201 Cypress Creek Pkwy, #530
Houston, TX 77068
chad@brazilanddunn.com

Rick Molina
Molina Law Firm
11550 Fuqua, Suite 580
Houston, TX 77034
rmolina@molinalawfirm.com

/s/ Nina Perales
Nina Perales